

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
HELENE MARIE YOHN	:	CASE NO. 1:22-bk-01760
Debtor	:	
	:	
HELENE MARIE YOHN	:	
Movant	:	
	:	
v.	:	
	:	
U.S. Bank Trust National Association	:	
Respondent	:	

MOTION TO REINSTATE THE AUTOMATIC STAY

COMES NOW the Debtor, by and through Kara K. Gendron, Esquire of Mott & Gendron Law, and requests that the Automatic Stay be reinstated, respectfully stating in support thereof:

1. The Debtor filed a Chapter 13 Petition on September 16, 2022.
2. The Debtor fell behind in monthly payments to U.S. Bank Trust National Association and entered into a stipulation to cure arrearages.
3. The Debtor received mortgage statements that conflicted with the stipulation terms and mistakenly believed that she did not have to make certain payments.
4. The Debtor has funds to bring the post-petition payments current.
6. Debtor's counsel has requested concurrence from the attorney for the Mortgagee but has not yet heard back as to whether the mortgagee concurs.

WHEREFORE, the Debtor respectfully request that this Court enter an order reinstating the automatic stay and granting relief such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron

Kara K. Gendron, Esquire
Attorney ID 87577
Mott & Gendron Law
125 State Street
Harrisburg, PA 17101

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Debtor(s)	:	
HELENE MARIE YOHN	:	
	:	
	:	
Movant(s)	:	
v.	:	
U.S. Bank Trust National Association	:	
Respondent	:	

ORDER

AND NOW,
UPON CONSIDERATION of the Motion to Reinstate the Automatic Stay, it is hereby
ORDERED AND DECREED that Automatic Stay is reinstated.

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IN RE: HELENE MARIE YOHN Debtor(s)	: : : : : :	CHAPTER 13 CASE NO. 1:22-bk-01760
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CERTIFICATE OF SERVICE

The undersigned attorney in the office of:

MOTT & GENDRON LAW, 125 STATE STREET, HARRISBURG, PA 17101

hereby certifies that a copy of the attached documents were mailed today to all parties listed below either electronically or by regular first class mail:

JACK N. ZAHAROPOULOS
STANDING CHAPTER 13 TRUSTEE
8125 ADAMS DRIVE, STE A
HUMMELSTOWN, PA 17036
TWecf@pamd13trustee.com

Michelle McGowan on behalf of Creditor U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for RCF 2 Acquisition
Trustmimcgowan@raslg.com

Dated: 07/23/2024

/s/ Kara K. Gendron

Kara K. Gendron, Esquire
MOTT & GENDRON LAW
125 State Street
Harrisburg, PA 17101
<http://www.mottgendronlaw.com>
T: (717) 232-6650 | F: (717) 232-0477
karagendron@gmail.com